

AO 91 (Rev. 11/11) Criminal Complaint

U.S. DISTRICT COURT N.D. OF N.Y.
FILED
DEC 05 2023
AT 10:00 O'CLOCK
for the
Northern District of New York
U.S. Marshal, Clerk - Syracuse

UNITED STATES OF AMERICA

v.

WILLIAM GLADNEY

Defendant(s)

Case No. *5:23-MJ-716 (TWS)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date(s) of January 25, 2023 in the county of Oswego in the Northern District of New York the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 2252A(a)(5)(B) and (b)(2)	Possession of Child Pornography

This criminal complaint is based on these facts:
See attached affidavit

Continued on the attached sheet.

Cory R Shepard

Complainant's signature

Cory Shepard, HSI Task Force Officer

Printed name and title

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: December 5, 2023

Thérèse Wiley Dancks

Judge's signature

City and State: Syracuse, NY

Hon. Thérèse Wiley Dancks, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Cory Shepard, being duly sworn, hereby state as follows:

I. INTRODUCTION

1. I am a Customs and Border Protection Officer (CBPO) with the U.S. Department of Homeland Security (DHS), Customs and Border Protection (CBP), and as such I am empowered by law to investigate and make arrest for offenses enumerated in Title 18, United States Code, Section 2252A.

2. I have been employed as a Task Force Officer (TFO) since November 2020 and I am currently assigned to the Homeland Security Investigation (HSI) Task Force Resident Agent Office in Alexandria Bay, New York. While assigned to HSI, I have been responsible for enforcing customs laws, immigration laws and federal criminal statutes of the United States. My responsibilities as a TFO with HSI include, but are not limited to, conducting investigations, executing arrest warrants, executing search warrants, collecting evidence, and interviewing witnesses. I have been a TFO for approximately two and one-half years and have investigated and/or participated in investigations of child pornography, narcotics, smuggling, and immigration-related cases. My duties include the enforcement of federal criminal statutes involving the sexual exploitation of children, as codified in Title 18, United States Code, Sections 2251 through 2259. I have participated in searches of premises and assisted in gathering evidence by means of a search warrant. I have received training in the area of the importation and distribution of child pornography and have had the opportunity to observe and review numerous examples of child pornography in many forms, including video and computer media.

3. My duties include the enforcement of federal criminal statutes involving the exploitation of children as codified in Title 18, United States Code, Sections 2251-2259. I have received training in the importation and distribution of child pornography and have had the opportunity to observe and review numerous examples of child pornography in many forms of media, including video and computer media.

4. This affidavit is made in support of an application for a criminal complaint charging William GLADNEY with a violation of Title 18, United States Code, Section 2252A(a)(5)(B) and (b)(2), for possession of child pornography.

5. The statements contained in this affidavit are based upon my investigation and information provided to me by other agents. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant has violated Title 18, United States Code, Section 2252A(a)(5)(B) and (b)(2) (possession of child pornography).

II. THE INVESTIGATION AND PROBABLE CAUSE

6. On January 25, 2023, Homeland Security Investigations Agents in the Syracuse office received an investigative lead from investigators with the Auburn Police Department (“APD”) regarding Gladney. According to the APD investigators, Gladney possessed Child Sexual Abuse Material (“CSAM”) on several devices that had been found at his home in Scriba, New York.

7. Specifically, APD and New York State Police (“NYSP”) searched Gladney’s home (where he lived alone) pursuant to a search warrant on January 25, 2023, and discovered a black LG tablet, Model LG-VK810IMEI 990002628624601 (product of China) (the “Tablet”) and a Lenovo all in one PC model F0EM006YUS, serial number MJ0D6SNY

(product of Mexico) (the “PC”). A subsequent forensic review of these devices determined that child pornography was saved on the devices.

8. Among other images and videos, the Tablet contained a video with a filename “bandicam 2020-09-19 21-18-48-359.mp4,” that is approximately 1:59 in length. This video depicts an adult male digitally penetrating the naked vagina and anus of a prepubescent female child approximately 4-6 years old. The Tablet also contained a video with a filename “#(pedo69niñ@s).mp4,” that is approximately 25 seconds in length. This video depicts an adult male penis penetrating the anus of a prepubescent female child approximately 8-10 years old. The Tablet contained approximately 7,500 additional images and several hundred videos of child pornography.

9. Among other images and videos, the PC contained an image with the filename “6aca1ca6f6ef03df.jpg” that depicts the anus and vagina of a prepubescent female child approximately 4-6 years old. In addition, the PC contained an image with the filename “b4df7356aa56e531.jpg” that depicts a prepubescent female child approximately 3-5 years old, lying on her back, and using her hands to spread and expose her anus and vagina. The PC contained approximately 5,000 additional images of child pornography.

10. On January 25, 2023, Gladney waived his *Miranda* rights and agreed to be interviewed. During the interview, Gladney admitted to knowingly possessing child pornography on his PC and Tablet that were found at his residence.

11. Gladney has a prior final conviction under the laws of the state of Texas, in that he was convicted on or about June 2, 2010, in the 239th District Court in Angleton, Texas (Case No. 0043351026), of one count of possession of child pornography, in violation of Texas Penal Code Section 43.26(A). Gladney received a sentence of probation for his crime and is required to register as a sex offender. As such, he is subject to the enhanced

penalties as described in 18 U.S.C. § 2252A(b)(2).

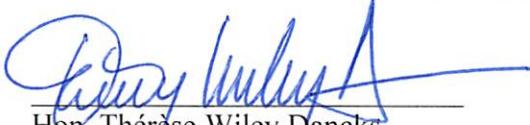
III. CONCLUSION

12. Based on the above information, there is probable cause to believe that William Gladney has violated Title 18, United States Code, Sections 2252A(a)(5)(B) and (b)(2) (possession of child pornography).

ATTESTED TO BY THE APPLICANT IN ACCORDANCE WITH THE REQUIREMENTS OF RULE 4.1 OF THE FEDERAL RULES OF CRIMINAL PROCEDURE.

Cory R Shepard
Cory Shepard, Task Force Officer
Homeland Security Investigations

I, the Honorable Thérèse Wiley Dancks, United States Magistrate Judge, hereby acknowledge that this affidavit was attested by the affiant by telephone on December 5, 2023, in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.


Hon. Thérèse Wiley Dancks
United States Magistrate Judge